NPDES
Inspection Report

Idaho Forest Group, LLC
(NPDES Permit #: IDR05C979)

Athol, Idaho

July 16, 2015

Prepared by:

Sandra Brozusky
Environmental Protection Agency, Region 10
Office of Compliance and Enforcement
Inspection and Enforcement Management Unit

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(Unless otherwise noted, all details in this inspection report were obtained from conversations with Brian Riley, Larry Benda, Ryan Fobes or from observations during the inspection.)

I. Facility Information

Facility Name: Idaho Forest Group, LLC (IFG, facility)
(Note that the Notice of Intent (NOI) submitted by the facility specified Idaho Forest Group - Chilco as the company name. As a result, the permit was issued to Idaho Forest Group - Chilco.)

Owner and Operator: Idaho Forest Group, LLC

Facility Contact(s):

Name	Title	Phone Number	Email Address
Brian Riley	Maintenance Manager	(208) 255-3231 (d) (208) 255-9229 (c)	briley@idahoforestgroup.com
Larry Benda	Boiler/Kiln Supervisor	(208) 255-9228 (c)	Lbenda@idahoforestgroup.com
Michael Henley	Plant Manager	(208) 255-9226 (c) (208) 255-3220 (d)	mhenley@idahoforestgroup.com
Ryan Fobes	Engineer	(208) 772-0505	

Physical/Mailing Address: 4447 East Chilco Road
Athol, ID 83801

GPS Coordinates: + 47.865881°/-116.74964°
(Obtained from the EPA ECHO database)

Receiving Water: The Notice of Intent (NOI) lists Rathdrum Creek as the facility's receiving water.

Permit #: IDR05C979

Number of Employees: There are approximately 220 employees at the Athol location. There are close to 800 employees company-wide.

Length of Operation: Idaho Forest Group, LLC has owned and operated this lumber mill since 2008. Prior to 2008, the facility was owned and operated by Riley Creek Lumber. During 2008 Riley Creek Lumber and Bennett Forest Group merged and changed the company name to Idaho Forest Group.

Facility Size:	The footprint of operations encompasses approximately 130 acres, however, IFG owns a total of 250 acres making up the Athol location.
Annual Revenue:	Annual revenue was approximately $110,000,000 gross for 2014.

II. Inspection Information

Inspection Date	July 16, 2015
Time Arrived	9:06 AM
Time Departed	4:10 PM
Weather Condition	Clear and Dry
Facility Representatives Present	Brian Riley (present throughout the inspection) Larry Benda (present throughout the inspection) Ryan Fobes (present after 1:00 pm)
EPA Inspectors Present (Inspection Team)	Sandra Brozusky (Lead Inspector) Joe Roberto
Observed Discharge	I did not observe any stormwater discharge on this day.

III. Scope of Inspection

The primary focus of this inspection was to conduct a compliance evaluation inspection to determine compliance with the Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP) and Section 402 of the Clean Water Act. For this facility, this meant evaluating the management of stormwater at the site.

In general, this inspection consisted of an opening conference to discuss the purpose and expectations of the inspection, a facility tour to inspect potential stormwater impacted areas of the site, a records review, and a closing conference to discuss the areas of concern identified during the inspection.

We did not collect samples at the time of this inspection.

IV. Inspection Entry

Specifics regarding entry at this facility are as follows:

- This was an unannounced inspection.
- The inspection team presented credentials to Mr. Brian Riley upon arriving at the facility.
- I (Sandra Brozusky) explained to Mr. Riley that this visit was a compliance inspection to determine compliance with the MSGP and the Clean Water Act.

- Mr. Riley did not deny the inspection team access to the facility.
- We (the inspection team) were allowed to inspect all areas of the facility that we wished to inspect.

V. Compliance History

Date of Last Inspection:	This facility has never been inspected by EPA or the State for compliance with the MSGP, according to Mr. Riley. According to EPA's ECHO database, the facility has never been inspected for compliance with the MSGP.
Enforcement Actions:	This facility has not been issued any penalty or compliance orders for purposes of compliance with the MSGP, according Mr. Riley.

VI. Facility Description/Background

Idaho Forest Groups is an operation that manufactures and sells lumber. This facility also manufactures and sells bark, woodchips and sawdust.

In general, this facility consists of three buildings where lumber processing activities are conducted and outdoor storage areas where various types of wood products are stored. These buildings include the sawmill, planer and kilns where raw logs are processed into final lumber products.

Outdoor storage includes the wet deck for logs, storage for bark and sawdust and finished lumber (both wrapped and unwrapped).

The bulk of the area of this facility us uncovered and is exposed to precipitation.

See Attachments A, B and G for details regarding the main components at this facility.

VII. Permit Information

At the time of the inspection, the facility was covered under the 2008 MSGP (Permit # IDR05C979). See Attachment C for a copy of the permit coverage letter dated December 30, 2009 which establishes that coverage under the MSGP began on January 29, 2010.

I did not obtain information at the time of the inspection to definitively establish coverage under the MSGP for the period prior to January 29, 2010.

VIII. Permit Applicability and Requirements

The facility's NOI for coverage under the MSGP indicates that the Standard Industrial Classification (SIC) code for the activity conducted at this facility is 2421 (General Sawmill). According to Appendix D of the MSGP, facilities that fall under SIC code 2421 are eligible for permit coverage under the MSGP. See Attachment D for a copy of the NOI submitted by this facility for coverage under the MSGP.

Coverage under the MSGP means that this facility is responsible for complying with MSGP requirements including the following:

- Prepare a Stormwater Pollution Prevention Plan (SWPPP) to cover stormwater related activities at the facility as established in Part 5 of the MSGP.

- Conduct and document routine facility inspections as established in Part 4.1 of the MSGP. These routine facility inspections must be conducted at least quarterly.

- Conduct and document a quarterly visual assessment of stormwater discharges as established in Part 4.2 of the MSGP. These visual assessments must be conducted quarterly.

- Conduct quarterly benchmark monitoring for COD, TSS, and total recoverable zinc as established in Part 8 Subsector A of the MSGP.

- Prepare and submit discharge monitoring reports (DMRs) which document the results of quarterly benchmark monitoring as established in Part 7.1 of the MSGP.

- Perform corrective actions to assure that stormwater discharges from the facility are achieving benchmark limitations as established in Part 3 of the MSGP.

- Prepare and submit an annual report to EPA that documents, among other things, the corrective actions conducted during the calendar year as established in Part 7.2 of the MSGP.

These listed permit requirements were the primary focus of the inspection. Where deficiencies were observed, I have documented them in the "Areas of Concern" section of this report.

IX. Facility Tour

During the facility tour we examined all areas occupied by this facility including the material storage areas, stormwater drainage pathways, liquids storage areas, stormwater collection systems, and any stormwater outfall locations.

X. Records Review

As part of the inspection, I requested that the following documents be produced for review:

- **NPDES Permit –** At the time of the inspection, Mr. Benda produced a copy of the MSGP.

- **SWPPP –** At the time of the inspection, I was provided with a SWPPP dated December 2009. See Attachment E for a copy of this SWPPP.

- **Quarterly Facility Inspection Reports** – At the time of the inspection, I was provided with documentation of routine facility inspections from June 2010 through April 2013. See Attachment F for this documentation.

- **Quarterly Visual Assessment Reports -** At the time of the inspection, Mr. Benda was not able to provide documentation of quarterly visual assessments.

- **Annual Reports –** At the time of the inspection, I was provided with the 2013 annual report.

Note that the review of the above documents was not a comprehensive review designed to identify all deficiencies. Rather, the review of these documents was more cursory in nature.

XI. Stormwater Generation, Treatment and Discharge

The MSGP allowed discharges from this facility include water used on the wet decks as well as stormwater generated from precipitation falling within the footprint of the facility.

All of the waters generated at this facility are ultimately contained in either the stormwater retention pond located on the northwest corner of the facility or in natural low spots located on the north and west sides of the facility. This facility is designed such that water in the stormwater retention pond and in the low spots either infiltration or evaporate.

In addition to these water collection areas, some of the water generated at this facility is also routed through a grassy swale before flowing into the stormwater retention pond.

According to Mr. Riley, the stormwater retention pond was expanded in 2013 to hold 850,000 cubic feet of water or just over 6 million gallons. In 2014, the grassy swale was also expanded. According to facility representatives, IFG expanded the stormwater retention pond and swale to ensure that discharges from the facility would not occur.

IFG uses and maintains a truck wash located in the center of the property. Water generated here is collected in a sump which is then processed using a heated evaporation

system. Water in this sump is not discharged into a receiving water or a municipal system.

See Attachment A and photographs 1-10 of Attachment B for details of this drainage area.

According to facility representatives, best management practices incorporated at this facility include:

- the stormwater retention pond,
- the grassy swale,
- sweeping the paved areas of the facility,
- use of cattle guards to knock off dirt from truck tires upon exiting the facility and
- berms along the perimeter of the property

XII. Receiving Water

IFG's notice of intent states that Rathdrum Creek is the receiving water for this facility. This is corroborated by IFG's SWPPP which states that the receiving water is Rathdrum Creek via drainage ditches. Facility representatives also indicated that Rathdrum Creek is located approximately 4 miles to the west of the facility, as a crow flies. However, according to Mr. Riley, stormwater from this facility has never discharged into Rathdrum Creek.

XIII. Areas of Concern

At the time of the inspection I identified several areas of concern. Specifically, the concerns at this facility are identified as follows:

A. SWPPP Update

At the time of the inspection, I asked the facility representatives to provide a copy of the latest SWPPP. Mr. Benda stated that IFG's consultant was in the process of updating the SWPPP to reflect changes at the site. The SWPPP was developed in 2009 and has not been updated since that time to reflect current conditions at the site.

See Attachment E for a copy of the SWPPP.

B. SWPPP Site Map

Condition 5.1.2 of the MSGP states various details that must be included in a site map.

At the time of the inspection, I asked facility representatives if the SWPPP included a site map. Mr. Benda provided an aerial image of the facility. I inquired

if there was a site map with details related to stormwater management at the facility. Mr. Benda provided a site map titled, "New Boiler, Dry Kilns and Planermill Existing Site Plan w/Proposed Facilities". This map identified building locations, roadways, the truck shop, and a "green belt" on the southern perimeter of the property.

This map did not include all details required under MSGP condition 5.1.2. Specifically the map did not include the following:

- directions of stormwater flow (use arrows);
- locations of all existing structural control measures;
- locations of all receiving waters in the immediate vicinity of your facility, indicating if any of the waters are impaired and, if so, whether the waters have TMDLs established for them;
- locations of all stormwater conveyances including ditches, pipes, and swales;
- locations of potential pollutant sources identified under Part 5.1.3.2;
- locations of all stormwater monitoring points;
- locations of stormwater inlets and outfalls, with a unique identification code for each outfall (e.g., Outfall No. 1, No. 2, etc), and an approximate outline of the areas draining to each outfall;
- locations of the following activities where such activities are exposed to precipitation:
    - fueling stations;
    - loading/unloading areas;
    - locations used for the treatment, storage, or disposal of wastes;
    - immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility;
    - transfer areas for substances in bulk; and
    - machinery

See Attachment G for copies of the maps provided at the time of inspection.

C. Quarterly Routine Facility Inspections

Condition 4.1.1 of the MSGP states that the permittee must "Conduct routine facility inspections of all areas of the facility where industrial materials or activities are exposed to stormwater, and of all stormwater control measures used to comply with the effluent limits contained in this permit. Routine facility inspections must be conducted at least quarterly (i.e., once each calendar quarter) although in many instances, more frequent inspection (e.g., monthly) may be appropriate for some types of equipment, processes, and control measures or areas of the facility with significant activities and materials exposed to stormwater."

Condition 4.1.2 of the MSGP states that "You must document the findings of each routine facility inspection performed and maintain this documentation onsite with

your SWPPP as required in Part 5.4." This condition also requires that, "At a minimum, your documentation of each routine facility inspection must include:

- The inspection date and time;
- The name(s) and signature(s) of the inspector(s);
- Weather information and a description of any discharges occurring at the time of the inspection;
- Any previously unidentified discharges of pollutants from the site;
- Any control measures needing maintenance or repairs;
- Any failed control measures that need replacement;
- Any incidents of noncompliance observed; and
- Any additional control measures needed to comply with the permit requirements."

At the time of inspection I requested copies of quarterly facility inspections. Mr. Benda stated that from June 2010 through April 2013, IFG hired a consultant to conduct quarterly environmental inspections. See Attachment F for documentation of these quarterly facility inspections. According to Mr. Benda, since April 2013 IFG did not conduct any quarterly routine inspections, as required in condition 4.1.1.

In addition to the above, based on a review of the quarterly facility inspection documentation from June 2010 through April 2013, not all required documentation components were included. Specifically the documentation did not include the following:

- The name(s) and signature(s) of the inspector(s)
- weather information, and
- a description of any discharges occurring at the time of the inspection

Although not specifically identified as a routine facility inspection, Mr. Benda stated that IFG does complete monthly inspections focused mainly on spill prevention of petroleum products. See Attachment H for an example of these monthly inspections. Based on a review of the monthly inspections, however, this does not include inspection of all areas of the facility as required for routine facility inspections.

D. <u>Quarterly Visual Assessment Documentation</u>

Condition 4.2.1 of the MSGP states that "Once each quarter for the entire permit term, you must collect a stormwater sample from each outfall (except as noted in Part 4.2.3) and conduct a visual assessment of each of these samples."

Condition 4.2.2 of the MSGP states that "You must document the results of your visual assessments and maintain this documentation onsite with your SWPPP as required in Part 5.4."

At the time of the inspection, I asked facility representatives if they had records of visual assessments. Mr. Benda replied that since the facility does not have a stormwater discharge, there is no stormwater sample to collect and visually assess. As a result, no records have been maintained.

E. Annual Report Submittal

Condition 7.2 of the MSGP states that "You must submit an annual report to EPA that includes the findings from your Part 4.3 comprehensive site inspection and any corrective action documentation as required in Part 3.4."

At the time of inspection, I asked to see copies of annual reports submitted to EPA. Mr. Benda produced the annual report for 2013 but was unable to find annual reports for 2010 - 2012. Mr. Benda inquired with IFG consultant about annual reports previous to 2013, but could not produce additional reports at the time of inspection. Mr. Benda was unsure if the annual reports had been completed during the 2010-2012 period.

Following the inspection Mr. Benda provided copies of annual reports for 2014 and 2015. See Attachment I for copies of the 2013-2015 annual reports.

XIV. Closing Conference

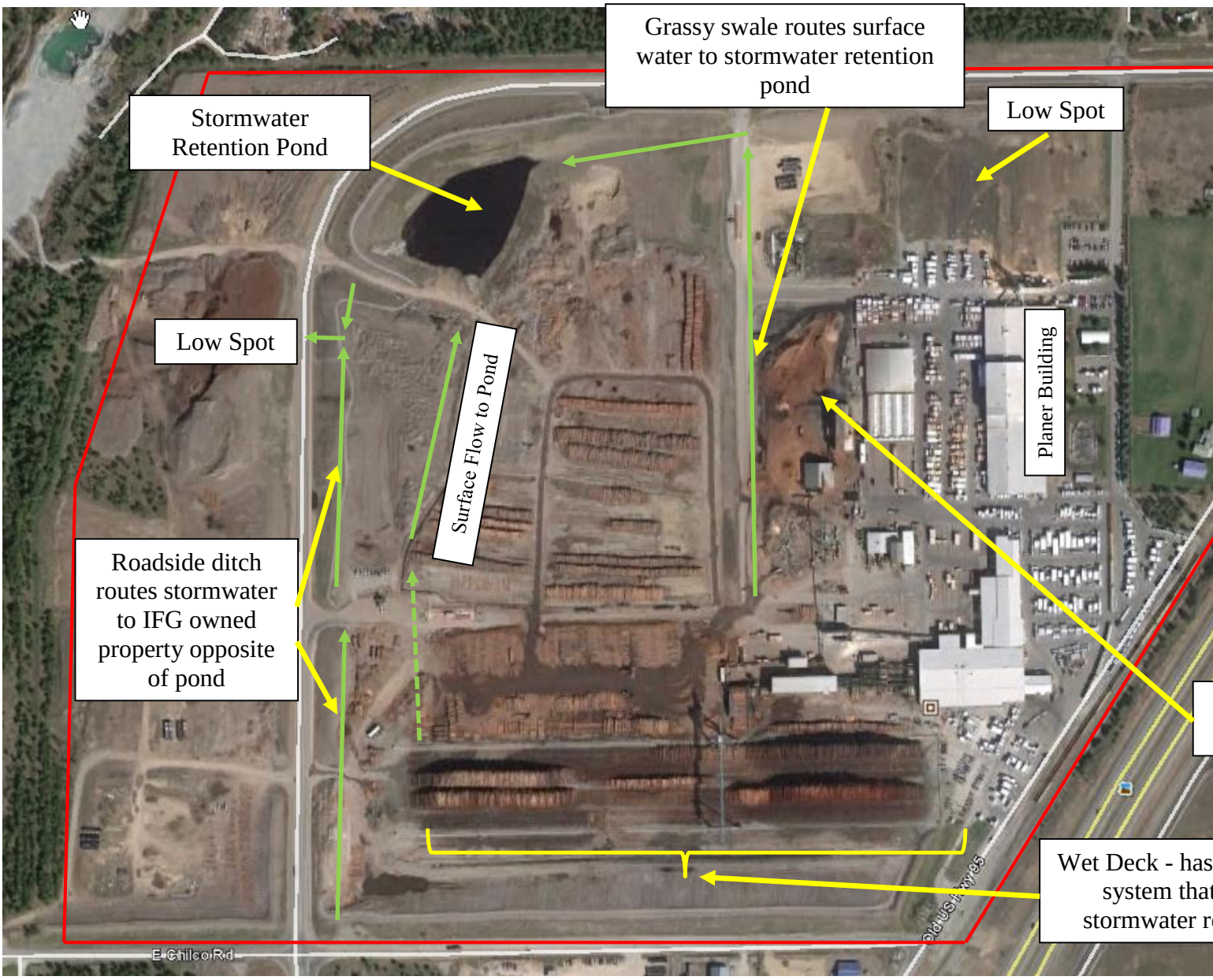
Prior to concluding the inspection, I held a closing conference with Mr. Riley, Mr. Benda and Mr. Fobes on July 16, 2015. The purpose of this closing conference was to discuss the preliminary findings of the inspection. I discussed the areas of concern listed above and then I thanked the representatives for the time and assistance with the inspection.

Report Completion Date: _____

Lead Inspector Signature: _____

Attachment A
Facility Aerial Image

Idaho Forest Group - Chilco


Grassy swale routes surface water to stormwater retention pond
Stormwater Retention Pond
Low Spot
Low Spot
Surface Flow to Pond
Planer Building
Roadside ditch routes stormwater to IFG owned property opposite of pond
Wet Deck - has
system that
stormwater r
E Chilco Rd
Old US Hwy 95

Attachment B
Photograph Documentation

Idaho Forest Group - Chilco

All photographs were taken by Joe Roberto using a Samsung SL605

1. Southwesterly view of the facility from the northeast corner of the property. Camera photo # SAM 1900.

2. Southerly view of the facility from the northern portion of the property. Note the low spot in the foreground which collects runoff from the finished product storage area shown in the background. Camera photo # SAM 1901.

3. Southerly view showing the southern portion of the swale located in the center of the property just west of the building complex. This swale is located just to the right of the road in the photograph. Camera photo # SAM 1903.

4. Northerly view showing the northern portion of the swale located in the center of the property just west of the building complex. This swale is located just to the left of the road in the photograph. Camera photo # SAM 1904.

5. Westerly view of one of the log spraying decks on the property. This spray deck is located just west of the swale on the center of the property. Note the swale in the foreground. Camera photo # SAM 1905.

6. Southwesterly view showing the stormwater pond located near the northwest corner of the facility. Camera photo # SAM 1909.

7. Southeasterly view taken from the northwest corner of the property. Note the stormwater pond in the foreground and the processing facility in the background. Camera photo # SAM 1910.

8. Southwesterly view showing the roadway along the west side of the property. Note the culvert between the roadway and the berm along the western property boundary (indicated by the yellow arrow). This culvert marks the low spot in this roadside drainage ditch system. If water from the facility flowed into this ditch system it would likely accumulate in this low spot. Camera photo # SAM 1911.

9. Easterly view from an entrance to the site near the southwest corner of the facility. Note the wet path in the gravel leading from the facility. According to facility representatives, this water is likely coming from the water trucks that wet the pavement in the area for dust suppression. This water is traveling in the direction of the roadside ditch seen in the previous picture. Camera photo # SAM 1918.

10. Looking in the opposite of the previous picture this is a westerly view from an entrance to the site near the southwest corner of the facility. Note the wet path in the gravel leading from the facility. According to facility representatives, this water is likely coming from the water trucks that wet the pavement in the area for dust suppression. Water seen here is leading to the roadside ditch seen in photograph 8. Camera photo # SAM 1919.

Attachment C
Permit Coverage Letter

Idaho Forest Group - Chilco

Attachment D
Notice of Intent

Idaho Forest Group - Chilco

Attachment E
Stormwater Pollution Prevention Plan

Idaho Forest Group - Chilco

Attachment F
Documentation of Quarterly Facility Inspections

Idaho Forest Group - Chilco

Attachment G
Facility Site Maps

Idaho Forest Group - Chilco

Attachment H
Monthly Inspections

Idaho Forest Group - Chilco

Attachment I
Annual Reports

Idaho Forest Group - Chilco